



July 16, 2010

Lynnette Irlmeier  
Executive Director  
Sexual Assault and Domestic Violence Center  
933 Court Street  
Woodland, Ca 95695

**SUBJECT:** Performance Assessment Report  
**GRANT #:** DV09061034 & DR09011034  
**RECIPIENT NAME:** Sexual Assault and Domestic Violence Center

Dear Ms. Irlmeier,

Thank you again for your time on July 15, 2010, when I conducted a Performance Assessment of the Domestic Violence Assistance (DV) Program grant for your agency. Attached please find a copy of the Performance Assessment including the Domestic Violence Recovery Act (DR) Addendum.

During the site visit, we discussed Cal EMA's requirements for the project, the goals and objectives of the program, the project's source documentation, and the reporting requirements. As a result of the visit, I have identified the following areas which need corrective action.

**California Environmental Quality Act (CEQA)**

Finding: Current CEQA documentation was not on file.

Citation: Recipient Handbook Section 2153 requires all Cal EMA funded projects to certify compliance with CEQA. A copy of the CEQA compliance memo or other certification must be completed once during the project's grant award cycle. The original copy must be retained on file for review during site and monitoring visits by Cal EMA staff.

Corrective Action: The project must obtain verification of compliance with CEQA or otherwise exemption from CEQA and submit copy to Cal EMA by **January 16, 2011**.

Comment: Contact your city or county planning department to have them prepare an environmental document stating whether the project will have a significant effect on the environment.

**Client Confidentiality**

Current Policy: No written policy exists for the handling, safekeeping, and eventual destruction of files, nor does a policy specifically identify the time period long term files should be kept.

Citation: Both the Victims Of Crime Act and the Family Violence Prevention Act contain provisions protecting the confidentiality of victims. Specifically, 42 U.S.C. 10402 (a)(2)(E) authorizes the state to ensure documented procedures have been developed and implemented (to include policies and procedures) "to assure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services by any program assisted under this chapter..."

Recommendation: Written protocols should be established for the long-term storage of and eventual destruction of client files, in order to protect against the dissemination of confidential client

information. Evidence of the development of a written policy should be submitted to Cal EMA no later than **January 16, 2011**.

### **Functional Timesheets**

Finding: The project is not currently using functional timesheets to track grant funded positions.

Citation: The Recipient Handbook (Section 11331) states "All grant-funded personnel must maintain time cards/sheets that indicate on a daily basis, the actual time worked on each Cal EMA project and account for all the time worked by the employee during the pay period... An allocation plan may be used to allocate salaries and benefits for individuals who work on more than one program or grant (see Section 2173)."

Corrective Action: Currently, the project tracks employees' hours by grant. However, these time sheets do not provide a description of what the employee is doing during the hours billed to the grant. The current method does not indicate function; it merely indicates billing allocation. A copy of the new functional timesheet should be submitted to Cal EMA no later than **January 16, 2010**. Additionally, the Employee Handbook should be revised to provide policy as to the use of functional timesheets.

### **Fidelity Bond**

Finding: The Fidelity Bond information does not contain the current grant number.

Citation: Recipient Handbook, Fidelity Bond, Section 2160, requires recipients to obtain a fidelity bond or an equivalent employee dishonesty insurance contract in an amount equal to 50 percent of the total grant award, less matching funds. Section 2161.2 indicates the Fidelity Bond must include Form A, Employee Dishonesty, and Form B, Forgery Coverage. The Fidelity Bond must provide blanket coverage of all employees; a scheduled bond is not acceptable. Further, Section 2161.4 states the certificate holder or first loss payee must be the State of California, Emergency Management Agency. The grant numbers for each grant covered must be included.

Corrective Action: See Recipient Handbook Section 2160, Certificate of Insurance, for the components that must be included in the certificate. Documentation from an insurance carrier that verifies the grant recipient is in compliance with this requirement must be submitted to Cal EMA by **January 16, 2011**.

### **EEO Policy**

Finding: The project lacks written policies for language assistance services that provide Limited English Proficiency (LEP) persons with meaningful access, i.e. oral interpretation services, bilingual staff, telephone interpreter lines, written language services, community volunteers, etc.

Citation: Recipient Handbook Section 2151.7 states, "Cal EMA program staff will provide an EEO Checklist to recipients prior to all site/monitoring visits. The checklist will assist Cal EMA in verifying that recipients are in compliance with state and federal civil rights requirements by noting that various EEO documents (EEO Policy, Nondiscrimination Poster) are available at the site/monitoring."

Corrective Action: Personnel responsible for EEO compliance should contact the Cal EMA EEO Compliance Officer at (916) 845-8454 for additional information on specific state and federal civil rights laws to ensure compliance. Additionally, the project should establish a written personnel policy and a written administrative policy for addressing the needs of those with LEP. Evidence of this new policy should be submitted to Cal EMA no later than **January 16, 2010**.

### **Staff Personnel Files**

**Finding:** The staff personnel files did not contain a signed and dated Drug Free Workplace statement.

**Citation:** Recipient Handbook Section 2152.3 (c)(2) states "(Employees) will agree to abide by the terms of the company's [Drug Free Workplace] statement as a condition of employment on the contract or grant."

**Corrective Action:** Personnel files for grant-funded staff must be brought into compliance by **January 16, 2010** and Cal EMA is to be notified once this is completed.

### **Organizational and Personnel Policies and Procedures**

**Finding:** The project lacks written organizational policy and procedures that establish the process whereby data is collected and then reported. The project lacks a formalized policy for the handling of data.

**Citation:** Recipient Handbook Section 11350 states, "The organization must have written policies and procedures covering hiring, firing, termination, conflict of interest, benefits, salary rates, travel, etc. There should also be written procedures regarding the accounting and reporting functions... In addition, any other policies and procedures (e.g., purchasing contracts) that relate to operating the project must be in writing."

**Corrective Action:** A comprehensive administrative policy and procedure manual should be created to formally document the methods used for the collection of data related to the project, the responsibility of personnel involved in the reporting of data, the policies for the operation of the business center on holidays and during lunch breaks, travel policy, as well as all other procedural guidelines for the functioning of the business. This process should be completed no later than **January 16, 2010**.

As for the other documentation that you were required to provide at the time of the site visit, I will be placing copies in your DV09/10 file and your master file at Cal EMA headquarters.

Enclosed is a copy of the completed Site Visit Checklist Form for your review. Please sign the cover page and return a copy of the page to me by **Monday, August 16, 2010 or sooner** as confirmation of receipt.

Thank you again for your hospitality during this visit. If you have any questions regarding the site visit please contact me at 916.324.9104 or Jason.Stalder@calema.ca.gov.

Jason Stalder  
Criminal Justice Specialist  
Domestic Violence Section

Enclosures

C: Cal EMA R&R Logistics